

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION

IN RE: § Case No. 22-60020  
INFOW, LLC, *et al.*, § Chapter 11 (Subchapter V)  
Debtors § Jointly Administered  
§

# EXHIBIT A

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT  
BRIDGEPORT DIVISION

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ERIC LAFFERTY; DAVID WHEELER; )  
FRANCINE WHEELER; JACQUELINE ) Adv. Pro. No. 22-05004 (JAM)  
BARDEN; MARK BARDEN; NICOLE )  
HOCKLEY; IAN HOCKLEY; JENNIFER )  
HENSEL; JEREMY RICHMAN; DONNA SOTO; )  
CARLEE SOTO-PARISI; CARLOS )  
M. SOTO; JILLIAN SOTO; AND WILLIAM )  
ALDENBERG; RICHARD M. COAN, TRUSTEE )  
OF THE BANKRUPTCY ESTATE OF ERICA L. )  
GARBATINI F/K/A ERICA LAFFERTY )  
Plaintiffs, )  
v. )  
ALEX EMRIC JONES; INFOWARS, LLC; FREE )  
SPEECH SYSTEMS, LLC; INFOWARS HEALTH, )  
LLC; PRISON PLANET TV, LLC; WOLFGANG )  
HALBIG; CORY T. SKLANKA; GENESIS )  
COMMUNICATIONS NETWORK, INC.; and )  
MIDAS RESOURCES, INC., )

Defendants.

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**NOTICE OF DISMISSAL WITH PREJUDICE OF CLAIMS AGAINST REMOVING  
DEFENDANTS INFOWARS LLC (aka INFOW, LLC), INFOWARS HEALTH, LLC (aka  
IWHealth, LLC) AND PRISON PLANET TV, LLC<sup>1</sup>**

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<sup>1</sup> There are three consolidated cases in the Connecticut Superior Court: *Lafferty v. Jones* (UWY- CV18-6046436-S), *Sherlach v. Jones* (UWY-CV18-6046437-S), and *Sherlach v. Jones* (UWY- CV18-6046438-S). These cases were abusively removed to this Court under names and docket numbers *Lafferty v. Jones* (22-05004), *Sherlach v. Jones* (22-05005), and *Sherlach v. Jones* (22-05006). This identical Notice of Dismissal is being filed in all three bankruptcy cases: 22-05004, 22-05005, and 22-05006.

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i) and Fed. R. Bankr. P. 7041, all of the plaintiffs in these three removed actions hereby voluntarily dismiss their claims against Infowars, LLC (aka InfoW, LLC); Infowars Health, LLC (aka IWHealth, LLC); and Prison Planet TV, LLC.<sup>2</sup>

Stated with more specificity, David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto-Parisi, Carlos M. Soto, Jillian Soto, William Aldenberg, William Sherlach, Robert Parker, Erica L. Garbatini f/k/a Erica Lafferty, and Richard M. Coan as Chapter 7 Trustee of the bankruptcy estate of Erica L. Garbatini<sup>3</sup> (hereafter “the plaintiffs”) voluntarily dismiss their claims against Infowars, LLC (aka InfoW, LLC); Infowars Health, LLC (aka IWHealth, LLC); and Prison Planet TV, LLC in these three removed cases (Connecticut Superior Court title and docket numbers *Lafferty v. Jones* (UWY- CV18-6046436-S), *Sherlach v. Jones* (UWY-CV18-6046437-S), and *Sherlach v. Jones* (UWY- CV18-6046438-S), now docketed in this Court as *Lafferty v. Jones* (22-05004), *Sherlach v. Jones* (22-05005), and *Sherlach v. Jones* (22-05006)).

This dismissal is as to the plaintiffs’ claims against Infowars, LLC (aka InfoW, LLC); Infowars Health, LLC (aka IWHealth, LLC); and Prison Planet TV, LLC only. The plaintiffs maintain each and all of their claims against the other defendants in these actions: Alex Emric

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<sup>2</sup> See *Williams v. MESA Underwriters Specialty Ins. Co.*, 538 F. Supp. 3d 234, 236 n.2 (D. Conn. 2021) (Dooley, J.) (appropriate to use Rule 41 to dismiss all claims against a particular defendant); *LeFevre v. Fishers Island Ferry Dist.*, 2018 WL 3025039, at \*3 (D. Conn. June 18, 2018) (Bolden, J.) (same); *Juliano v. Grand Hyatt New York, Inc.*, 2018 WL 1069578, at \*2-3 (D. Conn. Feb. 27, 2018) (Bolden, J.) (same); *Morron v. City of Middletown*, 2006 WL 1455607, at \*1 (D. Conn. May 23, 2006) (Hall, J.) (same); *Alston v. Pafumi*, 2011 WL 1885676, at \*1 (D. Conn. May 18, 2011) (Haight, J.) (same); *Grace v. Plank*, 2007 WL 4224221, at \*5 (D. Conn. Nov. 27, 2007) (Underhill, J.) (same); *Guigliano v. Danbury Hosp.*, 396 F. Supp. 2d 220, 224-25 (D. Conn. 2005) (Chatigny, J.) (same).

<sup>3</sup> Ms. Lafferty-Garbatini was at one time a party plaintiff to the consolidated actions, and Mr. Coan was then substituted for her as party plaintiff. The removing defendants incorrectly named Ms. Lafferty (and not Mr. Coan) as a plaintiff in the notice of removal, and Ms. Lafferty’s inclusion on this dismissal is unnecessary and superfluous. Nonetheless, to ensure that it is crystal clear that this dismissal is fully effective as to the Lafferty claims, this dismissal is made on behalf of both Ms. Lafferty-Garbatini and Mr. Coan.

Jones; Free Speech Systems, LLC; and Genesis Communications Network, Inc.

This dismissal is made unilaterally by the plaintiffs, is not the result of any agreement between the plaintiffs and the defendants in these actions, and is made without consideration of any kind from the defendants in these actions. This dismissal is with prejudice and without costs.

Dated: Bridgeport, Connecticut  
May 13, 2022

By: /s/ Alinor C. Sterling  
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By: /s/ Eric Goldstein  
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*Counsel for the Individual Plaintiffs*<sup>5</sup>

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<sup>4</sup>Koskoff, Koskoff & Bieder represents all of the plaintiffs, including Richard M. Coan solely in his capacity as Chapter 7 Trustee of the bankruptcy estate of Erica L. Garbatini.

<sup>5</sup>In connection with this proceeding, Shipman & Goodwin LLP represents Erica L. Garbatini f/k/a Erica Lafferty, David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto-Parisi, Carlos Mathew Soto, Jillian Soto, William Aldenberg, William Sherlach, and Robert Parker (collectively, the “Individual Plaintiffs”).

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2022, a copy of the foregoing Notice of Dismissal with Prejudice of Claims Against Removing Defendants InfoWars LLC (aka InfoW, LLC), InfoWars Health, LLC (IWHealth, LLC) and Prison Planet TV, LLC was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by First Class mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

I further certify that on May 13, 2022, a copy of the foregoing Notice of Dismissal with Prejudice of Claims Against Removing Defendants InfoWars LLC (aka InfoW, LLC), InfoWars Health, LLC (IWHealth, LLC) and Prison Planet TV, LLC was also served via U.S. First Class prepaid postage on the following parties listed below:

Wolfgang Halbig  
25526 Hawks Run Lane  
Sorrento, FL 32776

Genesis Communications Network, Inc.  
Attn. Officer, Managing Agent or Agent for  
Service  
190 Cobblestone Lane  
Burnsville, MN 55337

Norman A. Patis  
Pattis & Smith, LLC  
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New Haven, CT 06511

Cory T. Sklanka  
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Midas Resources, Inc.  
Attn. Officer, Managing Agent or Agent for  
Service  
190 Cobblestone Lane  
Burnsville, MN 55337

James H. Fetzer, PH.D.  
800 Violet Lane  
Oregon, WI 53575

/s/ Alinor C. Sterling  
ALINOR C. STERLING  
CHRISTOPHER M. MATTEI

/s/ Eric Goldstein  
ERIC GOLDSTEIN  
JESSICA M. SIGNOR